

**U.S. DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN**

---

TITUS DEPEAL	)Case No.: 2:25-cv-11276
	)HON. THOMAS L. LUDINGTON
	)
Plaintiff,	)
	)
v	)
	)
WOLVERINE HUMAN SERVICES;	)
WOLVERINE HUMAN SERVICES, INC.;	)
SAGINAW INTERMEDIATE SCHOOL	)
DISTRICT; SAGINAW INTERMEDIATE	)
SCHOOL DISTRICT BOARD OF	)
EDUCATION; and JOHN/JANE DOES	)
1-10, in their official, professional, personal,	)
and individual capacities, jointly and	)
severally,	)
	)
Defendants.	)
	)

---

ELIZABETH K. ABDNOUR (P78203)  
Attorney for Plaintiff  
325 e. Grand River Ave., Ste. 250  
East Lansing, MI 48823  
(517) 994-1776  
[liz@education-rights.com](mailto:liz@education-rights.com)

DAVID WESLEY CORNISH, ESQ.  
Attorney for Plaintiff  
230 South Broad St., 17<sup>th</sup> Floor  
Philadelphia, PA 19102  
(888) 313-1385  
[dwesley24@gmail.com](mailto:dwesley24@gmail.com)  
\*Admission application to be filed

---

---

GREGORY W. MAIR (P67465)  
KAILEN C. PIPER (P82865)  
Attorneys for Defendants Saginaw ISD &  
Saginaw ISD Board of Education  
300 St. Andrews Road, Suite 302  
Saginaw, MI 48638  
(989) 790-0960  
[gmair@owdpc.com](mailto:gmair@owdpc.com)  
[kpiiper@owdpc.com](mailto:kpiiper@owdpc.com)  
[dmccclure@owdpc.com](mailto:dmccclure@owdpc.com)

**APPEARANCE**

PLEASE TAKE NOTICE that I have caused my Appearance to be entered on behalf of Defendants, SAGINAW INTERMEDIATE SCHOOL DISTRICT and SAGINAW INTERMEDIATE SCHOOL DISTRICT BOARD OF EDUCATION, named in the above-entitled cause of action.

Respectfully Submitted,

Dated: May 7, 2025

/s/Kailen C. Piper  
KAILEN C. PIPER (P82865)  
Attorney for Defs. Saginaw ISD &  
Saginaw ISD Board of Education  
300 St. Andrews Road, Suite 302  
Saginaw, Michigan 48638  
kpipe@owdpc.com

**CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed the foregoing paper with the Clerk of the Court using the ECF system which will send confirmation of such filing to the following:

Elizabeth K. Abdour

[liz@education-rights.com](mailto:liz@education-rights.com)

David Wesley Cornish

[dwesley24@gmail.com](mailto:dwesley24@gmail.com)

Gregory W. Mair

[gmair@owdpc.com](mailto:gmair@owdpc.com)  
[dmccleure@owdpc.com](mailto:dmccleure@owdpc.com)  
[jmconnolly@owdpc.com](mailto:jmconnolly@owdpc.com)

Kailen C. Piper

[kpipe@owdpc.com](mailto:kpipe@owdpc.com)  
[kschaffer@owdpc.com](mailto:kschaffer@owdpc.com)

Respectfully submitted,

/s/ Kailen C. Piper

---

KAILEN C. PIPER (P82865)  
Attorney for Defendants Saginaw ISD  
& Saginaw ISD Board of Education  
300 St. Andrews Road, Suite 302  
Saginaw, Michigan 48638  
kpipe@owdpc.com

Date: May 7, 2025